



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

January 14, 2021

BY ECF

The Honorable William H. Pauley III
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. Amilcar Romero et al., 19 Cr. 734 (WHP)*

Dear Judge Pauley:

The Government writes, with the consent of counsel for Mr. Romero and Mr. Llevano Rivera, to respectfully request the exclusion of time under the Speedy Trial Act, pursuant to Title 18, United States Code, Section 3161(h)(1)(A), until November 1, 2021, a date the parties understand to be convenient for the Court to begin trial. The Government submits that the ends of justice served by such an exclusion outweigh the best interests of the defendants and the public in a speedy trial, because such an exclusion will allow the defendants to continue pursuing potential pretrial resolutions with the Government and to otherwise allow them to continue their review of discovery and to prepare for trial. In addition, such an exclusion will also ensure the effective assistance of counsel and prevent any miscarriage of justice. Defense counsel for Mr. Romero and Mr. Llevano consent to this motion.

Application granted. Trial scheduled for November 1, 2021. Time excluded until November 1, 2021 from Speedy Trial Act calculation. This Court finds that this continuance serves to ensure the effective assistance of counsel and to prevent any miscarriage of justice. By: Additionally, this Court find that the ends of justice served by such a continuance outweigh the best interests of the public and the defendants in a speedy trial pursuant to 18 U.S.C. § 3161(h)(8)(a).

Respectfully submitted,

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SO ORDERED:

WILLIAM H. PAULEY III
U.S.D.J.

January 15, 2021